

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

KRISTINE PETERSON on behalf of the	§	
child, KENDRA PETERSON; MELISSA	§	
PETERSON, and SHERRY HORNE, all	§	
individually and as lawful heirs of and to the	§	
Estate of Clinton Eugene "Chavez" Peterson,	§	
and ESTATE OF CLINTON EUGENE	§	
"CHAVEZ" PETERSON, deceased,	§	
Plaintiffs,	§	
	§	
v.	§	Cause No. 3:15-CV-00247-M
	§	
CITY OF DUNCANVILLE, DALLAS	§	
COUNTY, TEXAS; ROBERT D. BROWN,	§	
JR., in his capacity as Chief of Police, and	§	
Officers JOHN DOE I, JOHN DOE II and	§	
JOHN DOE III, in their respective individual	§	
and official capacities,	§	
Defendants.	§	

SUPPLEMENT TO DEFENDANTS' MOTION FOR SANCTIONS

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Defendants the City of Duncanville, Texas, and Robert D. Brown, Jr. who make and file this Supplement to their Motion for Sanctions pursuant to F.R.C.P. 37(b)(2)(A), (C) and 37(c). For same, Defendants would state the following:

1. Plaintiffs' Rule 26 disclosures were received by the undersigned counsel for Defendants on the morning of Oct. 28th, 2015.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully pray for the relief sought in their original motion; for such other and further relief as the Court may deem appropriate under F.R.C.P. 37; and, for such other and further relief, both general and special, to which Defendants may be justly entitled.

Respectfully submitted,

By /s/ Joe C. Tooley

State Bar No. 20129750
510 Turtle Cove, Suite 112
Rockwall, Texas 75087
(972) 722-1058
(972) 722-1070 (Facsimile)
Joe@Tooleylaw.com

ATTORNEY FOR DEFENDANTS
CITY OF DUNCANVILLE, TEXAS and
ROBERT D. BROWN, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to counsel for Plaintiffs in accordance with the Federal Rules of Civil Procedure, as modified by this Court's ECF Orders, on this 28th day of October, 2015.

/s/ Joe C. Tooley